

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS

Plaintiff,

v.

MIDDLE EAST FORUM, et al.,

Defendants.

Civil Action No. 2:19-cv-05030-JDW

**OPPOSITION TO DEFENDANTS'
MOTION IN LIMINE**

**PLAINTIFF'S RESPONSE IN OPPOSITION TO
DEFENDANTS' FOURTH MOTION IN LIMINE TO
PRECLUDE EVIDENCE ABOUT OTHER LITIGATION**

I. PRELIMINARY STATEMENT AND ARGUMENT

Plaintiff, Lisa Barbounis was sued by Defendant, Middle East Forum three times. Two of three cases have been dismissed. One of the three lawsuits were counterclaims that Defendants brought with no evidentiary support. The Court's ruling confirmed zero evidence Defendants had to initiate and maintain the counterclaims. If there is one undisputable fact that relates to these cases (other than the emotional impact that Greg Roman's sexual misconduct had upon Lisa Barbounis) it is this: Defendants would never have sued Lisa Barbounis if Lisa Barbounis did not allege sexual harassment involving Defendant, Roman. Every lawsuit presented by Middle East Forum is part of a crusade, authorized by Defendant, Daniel Pipes, supported by Middle East Forum donors, and quarter-backed by Defendant, Greg Roman. Defendant, Daniel Pipes has handed to Defendant, Greg Roman, a blank check. Defendant, Greg Roman has used the unwavering backing of Defendant, Daniel Pipes, to wage war against Lisa Barbounis, Caitriona Brady, and the lawyers and law firms that signed the cases of the victims of

Greg Roman's sexual harassment, sexual misconduct, and sexual assaults. Defendants call this "lawfare" (which of course is a play on the word warfare). Defendant, Middle East Forum, employee, and house-counsel, Mark Fink described the lawfare project.

Question: Lawfare. What's lawfare?

Answer: The offensive use of legal action to harass or bankrupt people.

Deposition of Mark Fink, House Counsel to Middle East Forum, page 6 line 19-21.

Lawfare is a Middle East Forum project and the strategy Middle East Forum has employed against the female victims who had the audacity to report Defendant, Greg Roman's sexual misconduct, by asking Defendant, Daniel Pipes for help. Of course Daniel Pipes testified that when Greg Roman's victims ask for help, he just sees a woman "moaning."

Defendant, Daniel Pipes admitted that Middle East Forum would withdraw all litigation involving Lisa Barbounis. Lisa Barbounis need only discontinue the attempts to vindicate her rights for the injuries she suffered at the hands of Defendant, Greg Roman.

Defendant, Greg Roman's strategy of "lawfare" against Lisa Barbounis included filing cases with no evidentiary support, filing a RICO case against Lisa Barbounis that Defendants withdrew to avoid Sanctions under FRCP Rule 11, and claiming that donor names, publicly listed on hundreds of websites are trade secrets. The willingness to lie and spend enormous amounts of money to avoid compliance with the law is relevant to Plaintiff's case. It goes directly to Plaintiff's punitive damages claim.

Defendants are mistaken when they represent that Plaintiff, Lisa Barbounis only presents claims under Title VII and the Pennsylvania Human Relations Act. Plaintiff also presents claims under the Philadelphia Fair Practices Ordinance, a law that provides for uncapped punitive damages and uncapped emotional distress damages. Defendant, Middle East Forum, Defendant,

Greg Roman, and Defendant, Daniel Pipes disregard for the laws is complete. Defendant, Greg Roman's desire to punish women who call out and report his sexual misconduct seems endless. Defendant, Daniel Pipes' willingness to back Defendant, Greg Roman, despite the plethora of women who have notified and asked for help from Defendant, Daniel Pipes seems unwavering.

CONCLUSION

Plaintiff, Lisa Barbounis should have the right to present evidence that indicates Defendants willful disregard for the laws. A willingness to go on the offensive and attempt to use the legal system to punish women who ask for help certainly demonstrates a willful disregard for Title VII, the Pennsylvania Human Relations Act, and the Philadelphia Fair Practices Ordinance.

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DATED: November 3, 2021

CERTIFICATE OF SERVICE

I, Seth D. Carson, hereby certify that on this date the foregoing Motion in Limine has been electronically filed with the Court and is available for viewing and downloading from the ECF System and thereby have been served upon the following counsel of record, electronically:

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